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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 | IN RE: SOCIAL MEDIA ADOLESCENT  
20 ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

## **SNAP INC.'S RESPONSE TO ADMINISTRATIVE MOTION TO SEAL**

Date Filed: February 21, 2023  
Judge: Hon. Yvonne Gonzalez Rogers  
Trial Date: Not set

This Document Relates to:

## ALL ACTIONS

## **SNAP INC.'S RESPONSE TO ADMINISTRATIVE MOTION TO SEAL**

2 On February 14, 2023, Plaintiffs filed the Master Complaint (ECF No. 136) for this case.  
3 The Master Complaint references, paraphrases, and quotes material from several documents that  
4 Snap Inc. (“Snap”), pursuant to an agreement with Plaintiffs, provisionally designated as highly  
5 confidential until a protective order is entered in this case and the documents can be designated  
6 pursuant to that protective order. Plaintiffs filed an Administrative Motion to Consider Whether  
7 Defendant Snap Inc.’s Materials Should be Sealed (Master Complaint) (ECF No. 135), pursuant to  
8 Civil Local Rules 7-11 and 79-5(f). Pursuant to Local Rules 7-11(b) and 79-5(f), Snap now  
9 responds to Plaintiffs’ administrative motion.

10 Snap does not move at this time to seal the references, paraphrases, or quotations that  
11 Plaintiffs included in the Master Complaint or to redact this material from the public version of the  
12 Master Complaint. Although Snap does not seek to designate the specific references, paraphrases,  
13 or quotations that Plaintiffs used as confidential, Snap reserves all rights to protect the  
14 confidentiality of the documents from which Plaintiffs obtained the references, paraphrases, and  
15 quotations. Snap does not waive any of its rights regarding the confidentiality of these documents  
16 and their contents, beyond what is explicitly included in the Master Complaint, for discovery or  
17 any other purpose. If any party moves to file any of these documents with the Court in the future  
18 or seeks to reference or quote any other portions of these documents in public filings, Snap  
19 reserves all rights to move for any of these documents or portions thereof to be filed under seal.

21 | DATED: February 21, 2023

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By: /s/ Jonathan H. Blavin  
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